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Attorney for Defendants
Municipality of Anchorage
Anchorage Police Department
Walt Monegan
Officers Voss and Henikman

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

CAROLYN MITCHELL,)
)
Plaintiff,)
)
vs.)
)
ANCHORAGE POLICE DEPARTMENT and)
the MUNICIPALITY OF ANCHORAGE, a)
municipal corporation, WALTER MONEGAN,)
Officer HENIKMAN, and Officer J. VOSS,)
)
Defendants.) Case No. 3:05-cv-00273-JWS
)

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S PROPOSED EXHIBITS

Defendants Municipality of Anchorage, Walt Monegan and Officers Henikman and Voss, through the Municipal Attorney's Office, file their Objections to Plaintiff's proposed exhibits as follows:

1. Defendants object to introduction of deposition transcripts and discovery responses (Plaintiff's Exhibits 7-9, 11-13 and 17-18) and the Monegan letter (Plaintiff's Exhibit 16) as exhibits. These objections are based on hearsay, cumulative of live testimony and best evidence.
2. While Defendants do not anticipate any party seeking to introduce deposition transcripts as exhibits, if Plaintiff does, Defendants object to any portion which they have marked for redaction and served on Plaintiff today. The bases for these objections include relevance, more prejudicial than probative, argumentative, calling for speculation, foundation, mischaracterizing testimony and mischaracterizing evidence.
3. At Defendants' depositions, Plaintiff questioned one officer about whether he had learned police procedures in Nazi Germany (Exhibit 7 at p.45, line 17 to p. 46, line 4). Plaintiff asked the other officer what damage his firearm could have caused, had it accidentally discharged (Exhibit 11 at pp. 53-57). Defendants object strenuously to such questioning, whether in the written record or at trial. The bases for these objections include relevance, more prejudicial than probative, argumentative, calling for speculation, foundation, mischaracterizing testimony and mischaracterizing evidence.

Respectfully submitted this 5th day of May, 2008.

JAMES N. REEVES
Municipal Attorney

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The undersigned hereby certifies that on 05/5/08 a true and correct copy of the *Defendants Objections to Plaintiff's Proposed Exhibits* was served on:

Isaac D. Zorea
Moshe C. Zorea

by first class regular mail, if noted above, or by electronic means through the ECF system as indicated on the Notice of Electronic Filing.

s/ Cathi Russell
Cathi Russell, Legal Secretary
Municipal Attorney's Office